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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

DANIEL CHECKMAN, Individually  
And On Behalf Of All Others Similarly  
Situated,

Plaintiff,

v.

ALLEGIANT TRAVEL COMPANY,  
MAURICE J. GALLAGHER, JR., and  
SCOTT SHELDON,

Defendants.

**Case No: 2:18-cv-03417-JFW-AS**

**STIPULATION TO EXTEND TIME  
TO RESPOND TO INITIAL  
COMPLAINT BY NOT MORE THAN  
30 DAYS (L.R. 8-3)**

Complaint Served: June 20, 2018

Current Response Date: Aug. 20, 2018

New Response Date: Sept. 17, 2018

1 WHEREAS, on April 24, 2018, Plaintiff Daniel Checkman (“Plaintiff”) filed a  
2 complaint against Allegiant Travel Company, Maurice J. Gallagher, Jr., and Scott Sheldon  
3 (collectively, “Defendants”) in the above-captioned case (the “Action”) alleging violations  
4 of the Securities Exchange Act of 1934 (the “Initial Complaint”);

5 WHEREAS, by Order entered July 17, 2018, the Court appointed Charles Brendon  
6 as Lead Plaintiff and approved of his selection of The Rosen Law Firm, P.A. as Lead  
7 Counsel;

8 WHEREAS, on August 15, 2018, the Parties filed a Stipulation and Proposed Order  
9 Setting Schedule for Filing of Amended Class Action Complaint and Briefing on Motion  
10 to Dismiss (ECF No. 23) (the “Stipulation and Proposed Order”), which was denied by the  
11 Court on August 17, 2018 for not showing good cause for “such an extended briefing  
12 schedule”;

13 WHEREAS, the deadline for Defendants to respond to the Initial Complaint is  
14 August 20, 2018;

15 WHEREAS, Defendants have requested and Lead Plaintiff has agreed to a twenty-  
16 eight (28) day extension for Defendants to respond to the Initial Complaint in light of the  
17 number and importance of the issues to be raised, such that the deadline would be  
18 Monday, September 17, 2018. This will also provide the Parties added time to discuss and  
19 submit a revised Stipulation and Proposed Order for Court approval;

20 WHEREAS, Local Rule 8-3 states that “A stipulation extending the time to respond  
21 to the initial complaint shall be filed with the Clerk. If the stipulation, together with any  
22 prior stipulations, does not extend the time for more than a cumulative total of thirty (30)  
23 days from the date the response initially would have been due, the stipulation need not be  
24 approved by the judge. Any such stipulation must have as its title ‘Stipulation to Extend  
25 Time to Respond to Initial Complaint By Not More than 30 days (L.R. 8- 3).’”  
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27  
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1 NOW, THEREFORE, by and through their respective counsel of record, the Parties  
2 hereby stipulate and agree that Defendants may have a twenty-eight (28) day extension,  
3 up to and including September 17, 2018, to file an answer or otherwise respond to the  
4 Initial Complaint, and nothing in this Stipulation shall be construed as a waiver of Lead  
5 Plaintiff's right to subsequently amend the Initial Complaint pursuant to Federal Rule of  
6 Civil Procedure 15.

7 Dated: August 20, 2018

**GREENBERG TRAURIG LLP**

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14 Dated: August 20, 2018

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